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February 21, 2008

BY FACSIMILE AND ECF

Honorable Theodore H. Katz
United States Magistrate Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Kathleen Mays, Ph.D. v. Washington Square Institute for Mental Health and
Psychotherapy and Gerd H. Fenchel, Ph.D., 07 CV 5976 (BSJ)(THK)

Dear Judge Katz:

This firm represents plaintiff Kathleen Mays, Ph.D. in the above-referenced action.

We write jointly with counsel for defendants, Washington Square Institute for Mental Health and Psychotherapy ("WSI") and Gerd H. Fenchel, Ph.D., to request a 45-day extension of the discovery deadlines set by the Scheduling Order dated October 16, 2007. This is the parties' first request for an extension of time. We make this request for the following reason.

The October 16, 2007 Order set February 15, 2007 for the completion of fact discovery. The parties have exchanged responses to interrogatories and document requests. As to depositions, plaintiff will be conducting approximately 8 depositions (inclusive of party and non-party witnesses). Due to the schedules of counsel and the parties, the parties require an additional 45 days, until March 31, 2008, to complete depositions and are in the process of negotiating a mutually agreeable deposition schedule. Accordingly, the parties request that the deadlines set by the October 16, 2007 Order be extended as follows:

Completion of Fact Discovery: March 31, 2008

Service of Plaintiff's Expert Witness Report: May 1, 2008

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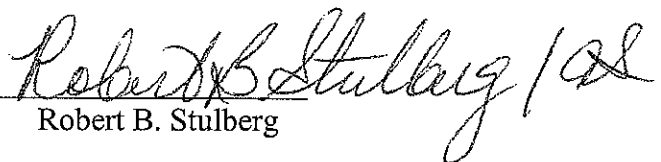
Service of Defendants' Responsive
Expert Witness Report: June 1, 2008

Completion of Expert Witness Depositions: July 1, 2008

Deadline for filing Dispositive Motions: July 15, 2008

The Court's considerations are appreciated.

Respectfully submitted,

By: 
Robert B. Stulberg

cc: Thomas Coppola, Esq. (by facsimile and ECF)

Encl.